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*Counsel for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION  
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS  
CLAIMS OBJECTION SCHEDULED FOR HEARING ON APRIL 24, 2014**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the following omnibus claims objection (the "Claims Objection") with

the Court for hearing on February 27, 2014:

- (a) Four Hundred Fifty-Sixth Omnibus Objection to Claims (No Liability Claims) **[Docket No. 42106]**.

2. Subsequently, the hearing on the Claims Objection was adjourned to April 24, 2014.

3. In accordance with the Second Amended Case Management Order, LBHI established an original deadline of February 18, 2014 (the “Response Deadline”) for parties to object or file responses to the Claims Objection. The Response Deadline was later extended, for certain parties, to March 26, 2014 (the “Extended Response Deadline”). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

4. The Extended Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claims Objection will be granted.

5. Accordingly, LBHI respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit A, which is unmodified since the filing of the

Claims Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: March 27, 2014  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
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**EXHIBIT A**

**(Proposed Order – Docket No. 42106)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING THE FOUR HUNDRED FIFTY-SIXTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred fifty-sixth omnibus objection to claims, dated January 17, 2014 (the “Four Hundred Fifty-Sixth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (Docket No. 6664) (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims, all as more fully described in the Four Hundred Fifty-Sixth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fifty-Sixth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Fifty-Sixth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Fifty-Sixth Omnibus Objection to Claims establish just cause

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fifty-Sixth Omnibus Objection to Claims.

for the relief granted herein; and after due deliberation and sufficient cause appearing therefore,  
it is

ORDERED that the relief requested in the Four Hundred Fifty-Sixth Omnibus  
Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims  
listed on Exhibit 1 annexed hereto (collectively, the “No Liability Claims”) are disallowed and  
expunged with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the  
validity, allowance, or disallowance of, and all rights to object and defend on any basis are  
expressly reserved with respect to, any claim listed on Exhibit A annexed to the Four Hundred  
Fifty-Sixth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is  
further

ORDERED that this Court shall retain jurisdiction to hear and determine all  
matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2014  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

## OMNIBUS OBJECTION 456: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 ICADE	08-13900 (SCC)	Lehman Commercial Paper Inc.	09/22/2009	28260	\$26,007,804.19 *	\$26,007,804.19*	No contractual obligations exist between Creditor and LCPI.
2 ICADE	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	28321	\$26,007,804.19 *	\$26,007,804.19*	Guarantee claim relating to claim 28260, however, there are no contractual obligations between Creditor and LCPI for claim 28260.
3 MORGAN STANLEY MORTGAGE SERVICING LIMITED	08-13900 (SCC)	Lehman Commercial Paper Inc.	09/22/2009	28322	\$3,842,497.34 *	\$3,842,497.34*	No contractual obligations exist between Creditor and LCPI.
4 MORGAN STANLEY MORTGAGE SERVICING LIMITED	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	28323	\$3,842,497.34 *	\$3,842,497.34*	Guarantee claim relating to claim 28322, however, there are no contractual obligations between Creditor and LCPI for claim 28322.
TOTAL					\$59,700,603.06	\$59,700,603.06	